

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

JONATHAN CONDE BLACKBURN,)	
)	
Plaintiff,)	Case No.: 1:23-cv-21065/CMA
)	
v.)	District Judge: Hon. Cecilia Altonaga
)	
CDJ OF 152 ND ST MIAMI LLC d/b/a,)	
CRAB DU JOUR, YIHUA WENG, individually,)	
and JONATHAN PAPAGNO, individually,)	
)	
Defendants.)	

**AGREEMENT ON PAYMENT OF ATTORNEY’S FEES AND COSTS
TO PLAINTIFF’S COUNSEL (“AGREEMENT”)**

This Agreement on Payment of Attorney’s Fees and Costs to Plaintiff’s Counsel (“Agreement”) resolves the outstanding issue of entitlement and amount of attorney’s fees and costs in the above-captioned matter. After engaging in the conferral process pursuant to S.D. Fla. L.R. 7.3, the Parties have agreed that Defendants, CDJ OF 152ND ST MIAMI LLC d/b/a CRAB DU JOUR, YIHUA WENG, individually, and JONATHAN PAPAGNO, individually, will jointly and severally pay a total of **Eighteen Thousand Five Hundred Dollars (\$18,500.00)** to Plaintiff’s counsel USA Employment Lawyers and O’Beidy & Associates to resolve all outstanding issues of attorney’s fees and costs in this case. This amount represents a negotiated sum that was significantly reduced in an effort to reach agreement on this issue and avoid additional litigation. For purposes of the Court determining the reasonableness of this amount, Plaintiff’s lead counsel Jordan Richards, Esq. and Andrew O’Beidy, Esq. each billed at a reasonable hourly rate of \$395.00 per hour. Defendants have agreed to not oppose Court approval of this amount of reasonable attorney’s fees and costs.

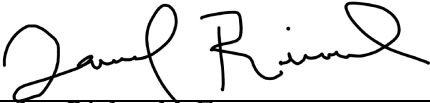
All payments under this Agreement shall be delivered to USA Employment Lawyers, Attn: Jordan Richards, Esq., 1800 SE 10th Ave. Suite 205, Fort Lauderdale, Florida 33316. The Parties have agreed that payments shall be made on the following basis:

- Payment 1: \$7,500.00 delivered in one check made payable to Jordan Richards PLLC by no later than 7 calendar days of Court approval and dismissal of the action with prejudice;
- Payment 2: \$2,750.00 delivered in one check made payable to Jordan Richards PLLC by no later than September 15, 2023;
- Payment 3: \$2,750.00 delivered in one check made payable to Jordan Richards PLLC by no later than October 15, 2023;
- Payment 4: \$2,750.00 delivered in one check made payable to Jordan Richards PLLC by no later than November 15, 2023;
- Payment 5: \$2,750.00 delivered in one check made payable to Jordan Richards PLLC by no later than December 15, 2023.

If Defendants fail to make any of the payments set forth above, Counsel for Plaintiff may petition the Court to enforce the terms of the Agreement and make seek to recover reasonable attorney's fees and costs incurred in seeking the enforcement of this Agreement. To that end, the Parties agree to request that the Court retain jurisdiction to enforce this Agreement through January 31, 2024. This agreement only affects compensation made to Counsel for Plaintiff and does not alter the rights of Plaintiff or the payment Plaintiff has already received which was previously approved by the Court in D.E. 54.

IN WITNESS WHEREOF, and intending to be legally bound, the Parties execute this Agreement on the dates indicated below:

COUNSEL FOR PLAINTIFF:




Jordan Richards, Esq.
Date: 09/11/2023 2023


Andrew O'Beidy, Esq.

Andrew O'Beidy, Esq.
Date: Sep 11, 2023 2023

DEFENDANTS:



CDJ of 152nd St Miami, LLC
Date: 09 / 05 / 2023 2023



Yihua Weng
Date: 09 / 05 / 2023 2023

Jonathan Papagno

Jonathan Papagno
Date: 09 / 10 / 2023 2023

Title	Agreement of Payment of Attorney's Fees and Costs
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09 / 05 / 2023
21:12:04 UTC

Sent for signature to Yihua Wang (little.julie.w@gmail.com) and Jonathan Papagno (cdj152miami@gmail.com) from lowell@kuvlinlaw.com
IP: 73.0.90.230



09 / 05 / 2023
21:27:36 UTC

Viewed by Yihua Wang (little.julie.w@gmail.com)
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09 / 05 / 2023
21:29:45 UTC

Signed by Yihua Wang (little.julie.w@gmail.com)
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09 / 10 / 2023
21:23:43 UTC

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IP: 73.138.89.98



09 / 10 / 2023
21:24:34 UTC

Signed by Jonathan Papagno (cdj152miami@gmail.com)
IP: 73.138.89.98



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21:24:34 UTC

The document has been completed.

Agreement of Payment of Attorney's Fees and Costs(signed by Defendants)

Final Audit Report		2023-09-11
Created:	2023-09-11	
By:	USA Employment Lawyers (jordan@jordanrichardspllc.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA4zDTIOhrUzPpZBToCEouliaL1oG5ZApV	



"Agreement of Payment of Attorney's Fees and Costs(signed by Defendants)" History



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